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P.O. Box 1002, Glen Rose, Texas 76043

Ref: NUREG 1805  
68 FR 43400

STARS-03024

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ATTN: John N. Hannon, Chief, Plant Systems Branch  
Division of Systems Safety and Analysis  
Office of Nuclear Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, DC 20555

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON NUREG-1805,  
“FIRE DYNAMICS TOOLS QUANTITATIVE FIRE HAZARD ANALYSIS  
METHODS FOR THE U.S. NUCLEAR REGULATORY COMMISSION  
FIRE PROTECTION INSPECTION PROGRAM”  
(68 FR 43400)**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> nuclear power plants endorse the comments provided by the Nuclear Energy Institute on NUREG-1805, Fire Dynamics Tools Quantitative Fire Hazard Analysis Methods for the U.S. Nuclear Regulatory Commission Fire Protection Inspection Program. STARS supports the concept of standardized guidance and training for inspectors charged with inspection activities of fire protection features. STARS believes the advancement of tools that support and promote the advancement of risk informing processes is important. STARS believes in the principals noted in the NUREG of a risk informed, objective, predictable, understandable focused regulatory process and believes that documents such as this help achieve that goal. However, there may be a tendency for individuals to take the course work and NUREG and set out on their own and become isolated. Fire Protection is a complex field that many times requires the assistance of fire protection experts. The NRC should emphasize that independency is not the goal of this document and that inspectors must seek guidance. In addition, STARS is concerned at the lack of guidance provided for differences in engineering judgment between the licensee and the inspector and the lack of specific instruction for issue resolution. This leads to a concern as to what the licensee

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<sup>1</sup> STARS is an alliance of six plants (eleven nuclear units) operated by TXU Energy, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

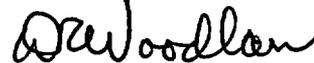
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will ultimately be held to in situations where the licensee and the inspector have a difference in understanding.

The NUREG provides a conservative method for estimating fire risk. With conservative data inputs and a novice user, inappropriate results can be generated. Because Fire Protection is so complex, a small difference in input can change results such that without full depth of understanding, the interpretation could lead to inappropriate findings. Therefore, the NRC user needs to fully understand the nature of the methodology and its limitations and put the results in the appropriate context. It will be difficult for inspectors to meet this expectation without the broader background, experience and training of a fire protection expert.

The STARS plants appreciate the opportunity to comment on NUREG 1805. If there are any questions regarding these comments, please contact me at 254-897-6887 or dwoodl1@txu.com.

Sincerely,



D. R. Woodlan, Chairman  
Integrated Regulatory Affairs Group  
STARS